

IN THE UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF ILLINOIS
URBANA DIVISION

FILED

MAY 02 2018

UNITED STATES OF AMERICA,)

Plaintiff,)

vs.)

MICHAEL HARI, JOE MORRIS,)

MICHAEL McWHORTER, and)

ELLIS "EJ" MACK,)

Defendants.)

CLERK OF THE COURT
U.S. DISTRICT COURT
CENTRAL DISTRICT OF ILLINOIS

Case No. 18-CR-20014

Title 18, United States Code,
Sections 2, 844(i), 922(g),
922(o), and 1951.

**SUPERSEDING
INDICTMENT**

COUNT 1

(Unlawful Possession of a Machinegun)

THE GRAND JURY CHARGES:

In or around October of 2017, up to and including February 27, 2018; in Ford
County, in the Central District of Illinois, and elsewhere,

**MICHAEL HARI, JOE MORRIS,
MICHAEL McWHORTER, and ELLIS "EJ" MACK,**

defendants herein, knowingly possessed a machinegun.

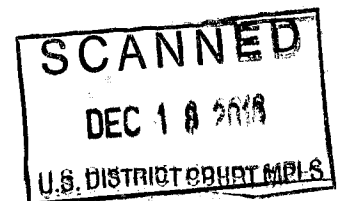
In violation of Title 18, United States Code, Sections 922(o) and 924(a)(2).

COUNT 2

(Conspiracy to Interfere with Commerce by Threats and Violence)

THE GRAND JURY CHARGES:

1. From on or about August of 2017, and continuing through at least



March 10, 2018, in Ford County, in the Central District of Illinois, and elsewhere,

**MICHAEL HARI, JOE MORRIS,
MICHAEL McWHORTER, and ELLIS "EJ" MACK,**

defendants herein, knowingly and intentionally conspired with each other and others, both known and unknown to the grand jury, to unlawfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect commerce, as that term is defined in Title 18, United States Code, Section 1951, by (a) robbery, that is the unlawful taking and obtaining personal property from the person and presence of another against his or her will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to his person and property; and (b) extortion, that is attempting to obtain the property from another, with his consent, induced by the wrongful use of actual and threatened force, violence, and fear.

2. Objects of the Conspiracy

The objects of this criminal conspiracy included to obtain money and property by robbery and extortion and to do so without detection by law enforcement authorities.

3. Means and Methods of the Conspiracy

Among the means and methods by which the conspirators conducted and participated in the criminal conspiracy are the following:

a. Around August of 2017, the conspirators formed a militia group that eventually identified itself as the "White Rabbits." The militia group obtained materials used to make explosive, destructive, and incendiary devices, provided weapons and uniforms to members of the group, and assigned ranks to its members.

These and other items belonging to the militia group were kept in a building located in Clarence, Ford County, in the Central District of Illinois.

b. On multiple occasions during the course of the conspiracy, the conspirators met in Clarence, Illinois, and agreed to perform "jobs" (i.e., criminal acts) to achieve the objects of the conspiracy and to fund the militia group. The conspirators then traveled together from Clarence, Illinois, to the location of their "jobs," sometimes using rented vehicles to avoid detection by law enforcement authorities.

4. Acts in Furtherance of the Conspiracy

In furtherance of the criminal conspiracy and to effect the object thereof, in the Central District of Illinois and elsewhere and on or about the dates set forth below, the defendants and others, both known and unknown to the grand jury, committed and caused to be committed acts in furtherance of the conspiracy, including, but not limited to, the following:

a. Robbing or attempting to rob WalMart stores engaged in interstate commerce, including but not limited to stores in Watseka, Illinois, on or about December 4, 2017, and Mt. Vernon, Illinois, on or about December 17, 2017;

b. Robbing or attempting to rob individuals suspected of being involved in interstate commerce, namely, drug trafficking, including but not limited to, individuals in Ambia, Indiana, on or about December 16, 2017;

c. Damaging or attempting to damage Canadian National Railway railroad tracks used in interstate commerce located near Effingham, Illinois, by an incendiary device on or about January 17, 2018, and then attempting to extort money

from the railroad by threatening additional attempts to damage railroad tracks if the railroad did not pay a ransom; and

d. Planting materials that could be used to make explosive, destructive, and incendiary devices on the property of J.O. in Clarence, Illinois, on or about February 18, 2018, in an attempt to deflect law enforcement suspicion from the conspirators to J.O.

All in violation of Title 18, United States Code, Sections 1951 and 2.

COUNT 3
(Attempted Arson)

THE GRAND JURY CHARGES:

On or about November 7, 2017, in Champaign County, in the Central District of Illinois,

**MICHAEL HARI, JOE MORRIS, and
MICHAEL McWHORTER,**

defendants herein, maliciously attempted to damage by means of fire and an explosive a building, namely, the Women's Health Practice in Champaign, Illinois, used in interstate commerce and in an activity affecting interstate commerce.

In violation of Title 18, United States Code, Sections 844(i) and 2.

COUNT 4
(Possession of a Firearm by a Felon)

THE GRAND JURY CHARGES:

In or around October of 2017, up to and including February 27, 2018, in Ford County, in the Central District of Illinois, and elsewhere,

MICHAEL HARI,

defendant herein, having been previously convicted in a court in the State of Illinois of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting commerce, a firearm, that is, (1) a .223/5.56 caliber AR-style platform rifle with no serial number; (2) a .223 caliber AR-style platform rifle with a short-barrel and no serial number; (3) a .223/5.56 AR-style platform rifle with a mini-barrel and no serial number; (4) an M16 AR-style platform rifle with no serial number; (5) a Remington 11-87 Super Mag, camouflage, 12 gauge shotgun, serial number SM039535; (6) an Ithaca Gun Company, Deerslayer 12 gauge shotgun, Model 37 Feather Lite, serial number 862123; (7) a Stoeger P3000 12 gauge shotgun, serial number 1640756; and (8) a Mossberg 12 gauge shotgun, Model 88 Maverick, serial number MV73194X.

In violation of Title 18, United States Code, Section 922(g)(1).

FORFEITURE ALLEGATIONS

THE GRAND JURY CHARGES:

1. The Grand Jury re-alleges and incorporates by reference the allegations of Counts One through Four of this Indictment as though fully set forth herein, for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).
2. In or around October of 2017, up to and including February 27, 2018, in Ford County, in the Central District of Illinois, and elsewhere,

**MICHAEL HARI, JOE MORRIS,
MICHAEL McWHORTER, and ELLIS "EJ" MACK,**

defendants herein, did engage in knowing and willful violations of Title 18, United States Code, Sections 922(g), 922(o), and 924, thereby subjecting to forfeiture to the United States, pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any firearms and ammunition involved in the commission of the offenses, including, but not limited to (1) a .223/5.56 caliber AR-style platform rifle with no serial number; (2) a .223 caliber AR-style platform rifle with a short-barrel and no serial number; (3) a .223/5.56 AR-style platform rifle with a mini-barrel and no serial number; (4) an M16 AR-style platform rifle with no serial number; (5) a Remington 11-87 Super Mag, camouflage, 12 gauge shotgun, serial number SM039535; (6) an Ithaca Gun Company, Deerslayer 12 gauge shotgun, Model 37 Feather Lite, serial number 862123; (7) a Stoeger P3000 12 gauge shotgun, serial number 1640756; (8) a Mossberg 12 gauge shotgun, Model 88 Maverick, serial number MV73194X; and any and all ammunition contained in or seized with said firearms.

All pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 924(d).

A TRUE BILL.

s/ Foreperson

FOREPERSON

s/ Gregory Harris


JOHN E. CHILDRESS
United States Attorney

ELM